

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LINDA FLINT EDGE,
Plaintiff,

v.

NORFOLK FINANCIAL CORPORATION
and DANIEL W. GOLDSTONE,
Defendants.

No. 04-12134 DPW

**PLAINTIFF'S L. R. 56.1 STATEMENT OF MATERIAL FACTS
AS TO WHICH THERE EXISTS A GENUINE ISSUE**

Pursuant to Local Rule 56.1, plaintiff, Linda Flint Edge, submits this Statement of Material Facts as to Which There Exists a Genuine Issue to be tried in opposition to Defendants' Motion for Summary Judgment. Plaintiff asserts that there are genuine issues to be tried as to whether:

1. Norfolk filed suit on the Providian account involved herein on October 21, 2004. (O'Connor Aff. ¶ 2).¹

2. Plaintiff raised no issue as to her obligation and indebtedness as alleged by Norfolk. (Edge Aff. ¶ 3)

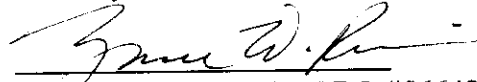
3. There was a hearing in small claims court on January 8, 2004 on Norfolk's case against Plaintiff. *Id.*

4. On March 1, 2004 Plaintiff called Norfolk, said she could not pay the agreed settlement on schedule, and would pay \$40.00 monthly toward retirement of the judgment. (Edge Aff. ¶ 4)

5. Plaintiff disputes the debt in her Complaint.

¹ The small claims court records submitted by Defendants show that Defendants filed suit on November 24, 2003.

Respectfully submitted
Attorney for the Plaintiff

A handwritten signature in black ink, appearing to read "Yvonne W. Rosmarin", is written over a horizontal line.

Yvonne W. Rosmarin BBO #566428
Law Office of Yvonne W. Rosmarin
58 Medford Street
Arlington, MA 02474
781-648-4040